IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS TYLER DIVISION

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)
) CIVIL ACTION NO. 6:12-CV-100
) JURY TRIAL DEMAND
)
))

JOINT MOTION TO EXTEND DEADLINE FOR SUBMISSION OF PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW

Core Wireless S.a.r.l. ("Core Wireless") and Apple Inc. ("Apple") are simultaneously filing a Joint Notice of Compliance as required by the Court's August 7, 2014 Order (Dkt. 262, the "Order"). As more fully set forth in the Joint Notice, the parties have agreed to submit certain issues to a bench trial before Magistrate Judge Love.

The parties jointly move to extend the deadline in the Order for the submission of proposed findings of fact and conclusions of law corresponding to the issues that parties have agreed to submit to the Court from August 15 to September 2, 2014, the same day that the parties are required to submit preliminary draft jury instructions relating to damages.

The parties make this request for two related reasons. First, the parties engaged in extensive meet-and-confer discussions regarding a potential bench trial that extended into this past weekend. Accordingly, the scope of what the parties would be required to file (jury instructions versus proposed findings of fact/conclusions of law) has been in flux. Second, because the parties have agreed to submit all of their (non-stayed) contract claims as well as Apple's unenforceability defense to the Court, the parties believe it would benefit both the Court and the parties for the parties to have additional time in which to prepare their proposed findings of fact and conclusions of law. This time would allow the parties to refine the filings and present the Court with a well-developed set of materials that would clearly and squarely present the legal and factual issues for the bench trial.

Thus, if the Court approves, on September 2, the parties would separately file comprehensive submissions including jury instructions relating to FRAND damages as directed by the Order along with their proposed findings of fact and conclusions of law for the bench trial.

Accordingly, the parties respectfully request that the Court enter the Proposed Order extending the deadline for submitting proposed findings of fact and conclusions of law until September 2.

Dated: August 18, 2014

Respectfully Submitted,

By: /s/ Henry Bunsow

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed.R.Civ.P. 5(d) and Local Rule CV-5(d) and (e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of this document via email, Federal Express and/or U.S. First Class Mail.

Dated: August 18, 2014

/s/ Joseph J. Mueller Joseph J. Mueller